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**UNITED STATES DISTRICT COURT**

**SEALED**

**DISTRICT OF ARIZONA**

UNITED STATES OF AMERICA

V.

Joshua Russell,

*Defendant*

CRIMINAL COMPLAINT

CASE NUMBER:

OHND CASE NO. 1:22 MJ 4364

I, the undersigned complainant, being duly sworn, state that the following is true and correct to the best of my knowledge and belief:

**Count 1**

On or about August 2, 2022, in the District of Arizona and elsewhere, JOSHUA RUSSELL, for the purpose of issuing a threat to injure and kill another person and with knowledge that the communication would be viewed as a threat to injure and kill another person, knowingly transmitted in interstate commerce a communication containing a true threat to injure and kill another person by stating the following in a voicemail telephone message left on the desk phone voicemail of an official with the Arizona Secretary of State's Office: "This message is for traitor [VICTIM-1's full name] . . . You're the enemy of the United States, you're a traitor to this country, and you better put your sh[inaudible], your f\*\*\*ing affairs in order, 'cause your days [inaudible] are extremely numbered. America's coming for you, and you will pay with your life, you communist f\*\*\*ing traitor bitch," in violation of Title 18, United States Code, Section 875(c).

**Count 2**

On or about September 9, 2022, in the District of Arizona and elsewhere, JOSHUA RUSSELL, for the purpose of issuing a threat to injure and kill another person and with knowledge that the communication would be viewed as a threat to injure and kill another person, knowingly transmitted in interstate commerce a communication containing a true threat to injure and kill another person by stating the following in a voicemail telephone message left on the voicemail system the Arizona Secretary of State's Office: "This message is for terrorist [VICTIM-1's last name]. The only reason you're still walking around on this planet is because we're waiting for the midterms to see you prosecuted for the crimes you have done to our nation. You are a terrorist. You are a derelict criminal. And you have a

few short months to see yourself behind bars, or we will see you to the grave. You are a traitor to this nation, and you will suffer the f\*\*\*ing consequences," in violation of Title 18, United States Code, Section 875(c).

**Count 3**

On or about November 15, 2022, in the District of Arizona and elsewhere, JOSHUA RUSSELL, for the purpose of issuing a threat to injure and kill another person and with knowledge that the communication would be viewed as a threat to injure and kill another person, knowingly transmitted in interstate commerce a communication containing a true threat to injure and kill another person by stating the following in a voicemail telephone message left on the voicemail system the Arizona Secretary of State's Office: "This message is for communist, criminal, [VICTIM-1's full name]... A war is coming for you. The entire nation is coming for you. And we will stop, at no end, until you are in the ground. You're a traitor to this nation. You're a f\*\*\*ing piece of sh\*\* communist, and you just signed your own death warrant. Get your affairs in order, cause, your days are very short," in violation of Title 18, United States Code, Section 875(c).

I further state that I am a Special Agent of the Federal Bureau of Investigation and that this complaint is based on the following facts:

**See Attached Statement of Probable Cause Incorporated By Reference Herein.**

Continued on the attached sheet and made a part hereof:      ☒ Yes      ☐ No

AUTHORIZED BY: Sean K. Lokey, AUSA SEAN LOKEY Digitally signed by SEAN LOKEY DN: cn=SEAN LOKEY, o=DOJ, ou=DOJ, email=sean.lokey@dhs.gov, c=US

Nathaniel D. Gena, Special Agent, FBI

Name of Complainant

  
Signature of Complainant

Sworn to me telephonically and signed

December 9, 2022 1:36 pm  
Date

at

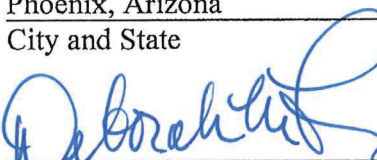
Phoenix, Arizona

City and State

HONORABLE DEBORAH M. FINE

United States Magistrate Judge

Name & Title of Judicial Officer

  
Signature of Judicial Officer